

[VIA ECF ONLY]

The Honorable Elizabeth A. Pascal
U.S. Magistrate Judge for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Copeland v. Poliquin Performance Center 2, LLC, et. al.*
Case #: 1-19-cv-20278-ESK-EAP (District of New Jersey)

February 10, 2025

Letter Request to Adjourn Depositions Pending Mediation and Related Relief

Dear Judge Pascal:

I write to respectfully request a postponement of the court-ordered depositions of Caroleen Kandel and the Poliquin corporate defendants scheduled for February 11-12, 2025, as the parties wish to pursue mediation before incurring additional deposition expenses.

Plaintiff submitted their settlement demand on February 6, 2025, in compliance with Your Honor's February 7th deadline, after which time the parties believe that proceeding with mediation before conducting these depositions could lead to a more efficient resolution and avoid unnecessary litigation costs.

Should mediation prove unsuccessful, we request that Your Honor's January 31st, 2025 Order (ECF 130) regarding the continuation of Ms. Kandel's April 2024 deposition remain in effect, preserving the court-ordered structure for completing discovery. Further, we request that the Poliquin Defendants and/or Ms. Kandel be required to promptly notify the Court and all parties if they file for bankruptcy protection during this period.

Additionally, we request that all discovery deadlines be tolled pending the outcome of mediation efforts. This would allow the parties to focus their resources on reaching a settlement while maintaining the ability to resume discovery if necessary.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

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cc: All counsel of record